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*Counsel for Secured Creditor Azadeh Nasser Azari*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

WANSDOWN PROPERTIES CORPORATION, N.V.,

### Debtor

x

## Chapter 11

Case No. 19-13223 (SMB)

**DECLARATION OF NADER MOBARGHA, ESQ IN SUPPORT OF SECURED  
CREDITOR AZADEH NASSER AZARI'S OBJECTION TO (i) DEBTOR'S  
MISREPRESETATIONS AND OMISSIONS IN ITS BANKRUPTCY FILINGS, AND (ii)  
DEBTOR'S APPLICATION FOR ENTRY OF AN ORDER AUTHORIZING THE  
RETENTION AND EMPLOYMENT OF BLANK ROME LLP AS SPECIAL  
LITIGATION COUNSEL; AND NOTICE OF HER INTENTION TO SEEK SANCTIONS  
AND FEES UNDER FEDERAL RULE OF CIVIL PROCEDURE 11 AND  
28 U.S.C. § 1927**

I, Nader Mobargha declare, under 28 U.S.C. § 1746, under penalty of perjury that:

1. I am a partner of the firm, Beys Liston & Mobargha LLP, attorneys for secured creditor, Azadeh Nasser Azari (“Ms. Azari”), in this Chapter 11 proceeding (“Bankruptcy Proceeding” or “Bankr. Proc.”).

2. I submit this declaration in support of secured creditor Azadeh Nasser Azari's Objection to (i) Debtor's Misrepresentations and Omissions in its Bankruptcy Filings, and (ii) Debtor's Application For Entry of An Entry Of An Order Authorizing the Retention and Employment of Blank Rome LLP as Special Litigation Counsel; and Notice of Her Intention To Seek Sanctions and Fees Under Federal Rule of Civil Procedure 11 and 28 U.S.C. § 1927.

3. Attached as **Exhibit 1** is a true and correct copy of the Execution Against Property to satisfy an April 21, 2016 judgment in favor of Azadeh Nasser Azari in the amount of \$2,700,225.00, with interest accruing from April 21, 2016.

4. Attached as **Exhibit 2** is a true and correct copy of the online profile of Gholam Reza Golsorkhi for the website of the Foundation For Iranian Studies.

5. Attached as **Exhibit 3** is a true and correct copy of the Notice of Entry with enclosed decision by the Appellate Division, First Department, dated October 23, 2018, in *Wansdown Properties Corporation, N.V. v. Azadeh Nasser Azari*, Index No. 151406/17.

6. Attached as **Exhibit 4** is a true and correct copy of the October 4, 2019 decision by the Honorable Nancy M. Bannon in *Kamran Abbas-Vahid v. Azadeh Nasser Azari*, *Wansdown Properties Corporation, N.V.*, Index No. 655724/19.

7. Attached as **Exhibit 5** is a true and correct copy of an October 7, 2019 email from N. Mobargha to L. Flick and M. Krezalek.

8. Attached as **Exhibit 6** is a true and correct copy of a June 4, 2019 email from L. Flick to N. Mobargha, copying M. Beys.

9. Attached as **Exhibit 7** is a true and correct copy of the By-Laws Pelmadulla Stiftung, dated August 7, 2007.

10. Attached as **Exhibit 8** is a true and correct copy of Azadeh Nasser Azari's Amended Third-Party Complaint against Pelmadulla Stiftung and its board members, dated September 27, 2019.

Dated: October 28, 2019  
New York, New York

**BEYS LISTON & MOBARGHA LLP**

By: \_\_\_\_\_/s/  
Nader Mobargha, Esq.

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